

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

**Re: Docket Nos. 5202, 5617**

**LAVANDA SANDS, L.L.C.’S JOINDER IN PRELIMINARY OBJECTION OF  
FONDATION SERENDIPITY, FONDATION ELEMENTS, SERENDIPITY  
NETWORK LTD AND LIQUIDITY NETWORK LTD TO THE FTX DEBTORS’  
MOTION TO ESTIMATE CLAIMS BASED ON DIGITAL ASSETS**

Lavanda Sands, L.L.C. (“Lavanda Sands”), by and through its undersigned counsel, hereby files this Joinder (this “Joinder”) in the *Preliminary Objection of Fondation Serendipity, Fondation Elements, Serendipity Network Ltd and Liquidity Network Ltd to the FTX Debtors’ Motion to Estimate Claims Based on Digital Assets* [D.I. 5617] (the “Objection”) to the *Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5202] (the “Estimation Motion”). In support of this Joinder, Lavanda Sands avers as follows:

1. Lavanda Sands is a creditor of Debtors FTX Trading Ltd., Alameda Research Ltd and Cottonwood Grove Ltd. Lavanda Sands acquired its claims from Fondation Elements and Liquidity Network Ltd. as reflected on *Transfer of Claim Other than For Security* [D.I. 3648] and *Transfer of Claim Other than For Security* [D.I. 3649], respectively.

2. Lavanda Sands joins in the positions and arguments set forth by Fondation Serendipity, Fondation Elements, Serendipity Network Ltd and Liquidity Network Ltd in the Objection.

---

<sup>1</sup> The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

WHEREFORE, Lavanda Sands respectfully requests that this Honorable Court sustain the Objection and deny the Estimation Motion, and for any such other relief as this Court may find just and equitable.

Dated: January 11, 2024  
Wilmington, Delaware

**BIELLI & KLAUDER, LLC**

/s/ David M. Klauder  
David M. Klauder, Esquire (No. 5769)  
1204 N. King Street  
Wilmington, DE 19801  
Phone: (302) 803-4600  
Email: dklauder@bk-legal.com

and

**CROWELL & MORING LLP**

Frederick Hyman, Esquire (*Pro Hac Vice*)  
590 Madison Ave.  
New York, NY 10022  
Phone: (212) 803-4028  
Email: fhyman@crowell.com

*Counsel for Lavanda Sands, L.L.C.*